

ORAL ARGUMENT NOT YET SCHEDULED

**IN THE UNITED STATES COURT OF APPEALS
FOR THE D.C. CIRCUIT**

Ruby Freeman, Wandrea' Moss,

Plaintiffs-Appellees,

v.

No. 24-7021

Rudolph W. Giuliani,

Defendant-Appellant.

CONSENT MOTION FOR EXTENSION OF TIME

Pursuant to Federal Rules of Appellate Procedure 26 and 27, and Circuit Rule 28(3), Appellees respectfully move for an extension of time in which to file their principal brief, to and including December 16, 2024, and for a corresponding extension of the remaining briefing schedule as set forth below. Unless extended, the deadline to file Appellees' principal brief is currently November 25, 2024. Appellant consents to this request.

For avoidance of doubt, Appellant's consent is based on the following agreement of the parties: (1) Appellees will not request any further extensions of time to file their principal brief, absent extraordinary and unforeseeable circumstances. (2) Appellant may seek an extension of time to file his reply brief of up to two weeks; Appellees will consent to any such request.

Good cause exists to grant this extension because of the continued press of unforeseen contested matters in the related enforcement proceedings in the Southern District of New York. *See Freeman v. Giuliani*, No. 24-mc-353 (S.D.N.Y.); *Freeman v. Giuliani*, No. 24-cv-6563 (S.D.N.Y.). Since Appellees' initial extension request was granted, several new matters have arisen in those proceedings that have required significant attention from Appellees' counsel. Moreover, if granted, the requested extension will afford Appellees only slightly less time to prepare their principal brief than the time afforded to Appellant between the decision dismissing Appellant's bankruptcy case and the date on which Appellant's principal brief was due. Granting this extension will permit Appellees to provide the most helpful presentation to the Court. Accordingly, Appellees respectfully request that the remaining briefing deadlines be extended as follows:

Appellees' Brief:	December 16, 2024
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Reply Brief:	January 20, 2025
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Deferred Appendix	January 20, 2025
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Final Briefs	January 22, 2025
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November 18, 2024

Respectfully submitted,

s/ Aaron E. Nathan

Michael J. Gottlieb
Meryl C. Governski
Willkie Farr & Gallagher LLP
1875 K Street NW

Washington, DC 20006
(202) 303-1442
mgottlieb@willkie.com
mgoverski@willkie.com

Aaron E. Nathan
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019
(212) 728-8904
anathan@willkie.com

CERTIFICATE OF COMPLIANCE

I certify that the foregoing motion complies with the typeface and style requirements of Federal Rule of Appellate Procedure 27(d)(1)(E), and the word limit of Federal Rule of Appellate Procedure 27(d)(2)(A), because the motion was prepared in double-spaced, 14-point Times New Roman font, and contains 286 words as determined by the word-count function of Microsoft Word.

s/ Aaron E. Nathan

CERTIFICATE OF SERVICE

I certify that the foregoing motion was served on all parties through the Court's CM/ECF system.

s/ Aaron E. Nathan